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19 *Attorneys for Plaintiffs and Petitioners John Williams, et al.*

20 **IN THE UNITED STATES DISTRICT COURT**  
21 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

22 JOHN WILLIAMS, *et al.*,

23 Plaintiffs and Petitioners,

24 vs.

25 ALAMEDA COUNTY, *et al.*,

26 Defendants and Respondents.

27 ALLIANCE OF CALIFORNIANS FOR  
28 COMMUNITY EMPOWERMENT ACTION,

Intervenor.

Case Number: 3:22-cv-01274-LB

**STIPULATED REQUEST TO EXTEND  
DEADLINE TO FILE AMENDED  
COMPLAINTS, RESPONSES, AND  
SERVE INITIAL DISCLOSURES**

CALIFORNIA APARTMENT  
ASSOCIATION, *et al.*,  
Plaintiffs and Petitioners,  
vs.  
COUNTY OF ALAMEDA, *et al.*,  
Defendants and Respondents.

Case Number: 3:22-cv-02705-LB

Pursuant to Local Rules 6-1 and 7-12, Plaintiffs and Petitioners in *Williams et al. v. County of Alameda et al.* Case No. 3:22-cv-01274 (collectively, “Williams Plaintiffs”), Plaintiffs and Petitioners in related case *California Apartment Association et al. vs. County of Alameda et al.* Case No. 3:22-cv-02705 (“CAA Plaintiffs”), and Defendants and Respondents ALAMEDA COUNTY, ALAMEDA COUNTY BOARD OF SUPERVISORS (collectively, “County Defendants”), CITY OF OAKLAND, and OAKLAND CITY COUNCIL (collectively, “City Defendants”) and Intervenor ALLIANCE OF CALIFORNIANS FOR COMMUNITY EMPOWERMENT ACTION (“Intervenor Defendant”) hereby submit a Stipulated Request as follows:

On May 3, 2023, the Court entered an order granting an extension of the parties’ initial disclosure deadline to four weeks after resolution of a motion to dismiss Plaintiffs’ complaints.

On November 10, 2023, the County Defendants, City Defendants and Intervenor Defendants filed Motions to Dismiss Plaintiffs’ complaints (collectively, “Defendants”). Also on November 10, 2023, the Williams Plaintiffs filed a Motion to Dismiss Intervenor Defendant from the case.

On February 29, 2024, the parties’ Motions to Dismiss were heard by the Court.

On September 3, 2024, the Court issued orders on the parties’ Motions to Dismiss, which, in part “grant[ed] [Defendants’] motions to dismiss all claims with prejudice except for the regulatory takings claims, which are dismissed without prejudice.” The Court’s order further provided “[a]ny amended complaint must be filed within twenty-eight days . . . .”

1 On September 13, 2024, Plaintiffs informed Defendants that they intend to file amended  
2 complaints, but needed additional time to do so. The parties thereafter stipulated to an additional  
3 60 days to amend.

4 On November 22, 2024, Plaintiffs informed Defendants that they intend to file amended  
5 complaints, but needed additional time to do so. The parties thereafter stipulated to an additional  
6 60 days to amend.

7 On January 16, 2025, Plaintiffs informed Defendants that they intend to file amended  
8 complaints, but needed a bit more additional time to do so.

9 The parties hereby stipulate to an additional 30 days to amend, so that any amended  
10 complaint must be filed by March 3, 2025. . Barring unforeseen circumstances, Plaintiffs do not  
11 intend to seek any further extensions of time to file an amended complaint(s), and Defendants  
12 will not stipulate to any further extensions.

13 Given that Plaintiffs intend to file amended complaints, the parties further agree to extend  
14 Defendants' deadline to respond to any amended complaint(s) such that any answer or motion  
15 to dismiss must be filed by 30 days after service of the amended complaint.

16 Accordingly, the parties request that the Court continue the Case Management  
17 Conference currently set for March 27, 2025 at 11:00 a.m. to May 8, 2025 at 11:00 a.m.

18 The parties also agree that judicial economy would best be served by extending the initial  
19 disclosure deadline, to either (A) four weeks after filing of Defendants' answers or (B) four  
20 weeks after resolution of a motion to dismiss, if Defendants file such a motion.

21 SO STIPULATED.

22 Respectfully submitted,

23  
24 Dated: January 21, 2025

25 ZACKS & FREEDMAN, PC

PACIFIC LEGAL FOUNDATION

26 /s/ Emily L. Brough  
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/s/ Jonathan M. Houghton  
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Attorneys for the Williams' Plaintiffs

Dated: January 21, 2025

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Dated: January 21, 2025

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ALAMEDA COUNTY BOARD OF  
SUPERVISORS

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Dated: January 21, 2025

By: /s/ Allison Ehlert  
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Dated: January 21, 2025

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Empowerment Action

**~~PROPOSED~~ ORDER**

PURSUANT TO STIPULATION and good cause finding, IT IS SO ORDERED that:

- (1) Plaintiffs' deadline to file any amended complaint is extended to March 3, 2025;
- (2) Defendants' deadline to file an answer or motion to dismiss is extended to 30 days after service of the amended complaint;
- (3) The Case Management Conference previously set for March 27, 2025 at 11:00 a.m. is reset to May 8, 2025 at 11:00 a.m.; and
- (4) The parties' initial disclosure deadline is extended to either (A) four weeks after filing of Defendants' answers or (B) four weeks after resolution of a motion to dismiss, if Defendants file such a motion.

Dated: January 21, 2025



Hon. Laurel Beeler  
United States Magistrate Judge

**ZACKS & FREEDMAN, PC**  
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**ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the other signatories.

DATED: January 21, 2025

/s/ Emily Brough

Emily Brough

1873049.1

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**PROOF OF SERVICE**

United States District Court—Northern District of California- Case No.: 3:22-cv-01274-LB  
Case No.: 3:22-cv-02705-LB (related)

I, Valeria Bentorkia-Moran, declare that:

I am employed in the County of San Francisco, State of California. I am over the age of 18, and am not a party to this action. My business address is 180 Montgomery Street, Suite 1950, San Francisco, California 94104.

On January 21, 2025, I served:

**STIPULATED REQUEST TO EXTEND DEADLINE TO FILE AMENDED  
COMPLAINTS, RESPONSES, AND SERVE INITIAL DISCLOSURES**

in said cause addressed as follows:

<p>PACIFIC LEGAL FOUNDATION JONATHAN HOUGHTON (NJ Bar No. 369652021) 3100 Clarendon Blvd., Suite 610 Arlington, VA 22201 BRIAN HODGES (WA Bar No. 31976) SAM SPIEGELMAN (NY Bar No. 5573100) 255 South King Street, Suite 800 Seattle, WA 98104 Email: <a href="mailto:JHoughton@pacificlegal.org">JHoughton@pacificlegal.org</a> Email: <a href="mailto:BHodges@pacificlegal.org">BHodges@pacificlegal.org</a> Email: <a href="mailto:SSpiegelman@pacificlegal.org">SSpiegelman@pacificlegal.org</a></p> <p><i>Attorney for John Williams, Robert Vogel, Sheanna Rogers, Michael Loeb, Jacqueline Watson-Baker, Housing Providers of America</i></p>	<p>MARC SELTZER KRYSTA K. PACHMAN GLENN C. BRIDGMAN NICHOLAS N. SPEAR SUSMAN GODFREY L.L.P. 1900 Avenue of the Stars, Suite 1400 Los Angeles, CA 90067-6029 Email: <a href="mailto:mseltzer@susmangodfrey.com">mseltzer@susmangodfrey.com</a> Email: <a href="mailto:kpachman@susmangodfrey.com">kpachman@susmangodfrey.com</a> Email: <a href="mailto:gbridgman@susmangodfrey.com">gbridgman@susmangodfrey.com</a> Email: <a href="mailto:nspear@susmangodfrey.com">nspear@susmangodfrey.com</a></p> <p><i>Attorneys for Intervenor-Defendant Alliance of Californians for Community Empowerment Action</i></p>
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PROOF OF SERVICE


Case No.: 3:22-cv-01274-LB Case No.: 3:22-cv-02705-LB(related)



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/XX/ (BY ELECTRONIC SERVICE) Based on a court order or an agreement of the parties to accept electronic service, I caused the said document to be served electronically through the CM/ECS System.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on January 21, 2025 at San Francisco, California.



VALERIA BENTORKIA-MORAN

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